

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., HASSAN
AHMED, and STEPHEN NILL,

Defendants.

Case No.: C-04-10294-DPW

Class Action

This Document Relates To:

ALL RELATED ACTIONS.

**DECLARATION OF PATRICIA A. SZUMOWSKI IN SUPPORT
OF BPI GLOBAL ASSET MANAGEMENT LLP'S MOTION
FOR LEAVE TO MANUALLY FILE PAPERS WITH THE COURT**

FILED
IN CLERKS OFFICE
2004 APR 26 A 10:54
U.S. DISTRICT COURT
DISTRICT OF MASS.

I, Patricia A. Szumowski, declare:

1. I am local counsel for proposed Lead Plaintiff BPI Global Asset Management LLP ("BPI Global"). I am duly admitted to practice law in this Court. I submit this declaration in support of BPI Global Asset Management LLP's Motion For Leave To Manually File Its Papers With The Court. The matters stated herein are true of my own personal knowledge and, if called to testify thereto, I could and would competently do so.

2. On April 12, 2004, the same day Lead Plaintiff motions were due in this case, this Court entered its Order For Electronic Filing. It requires that all submissions relating to motions in this case be filed electronically through the Court's CM/ECF system. Neither I nor my co-counsel are presently registered as users of the CM/ECF system. Thus, upon learning of the Order For Electronic Filing, I submitted the requested information to register. The confirmation page I received indicates that my registration information was successfully submitted. A true and correct copy of the confirmation page is attached hereto as Exhibit A.

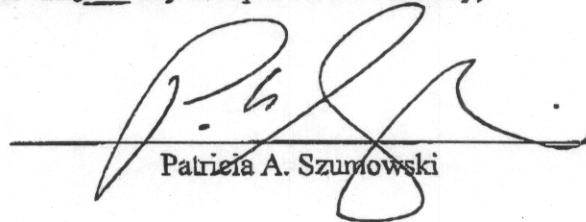
3. I subsequently learned from Court personnel that it will take up to two weeks for my registration as a user of the CM/ECF system to be activated. However, BPI Global's papers in opposition to the competing motions to be appointed Lead Plaintiff in this case are due on April 26, 2004. BPI Global may also need to submit other papers to the Court prior to the date my CM/ECF registration is activated.

4. The Court's April 12, 2004 Order For Electronic Filing states that paper documents may be filed in lieu of an electronic filing if leave is granted upon good cause shown. Because my registration as a user of the CM/ECF system will not be active by the due date of

BPI Global's opposition papers, I believe good cause exists to allow the filing of paper documents.

5. Once I am able to file documents electronically through the CM/ECF system, it is my intention to make subsequent filings in that manner in accordance with the Court's Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this ^{23rd} day of April 2004 at Hadley, Massachusetts.



Patricia A. Szumowski